

EXHIBIT A

DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS

1. Are you, a close relative, or a close friend an attorney? What is your, or their, area of specialty?
2. Have you served on a jury or a grand jury? If yes, please state what court the proceeding was in, whether it was a criminal or civil case, the nature of the charges or claims and the outcome.
3. Are you, a close relative, or a close friend employed by law enforcement, including any federal, State, county or local department, bureau, or agency?
4. Are you more inclined to believe the statements of government agents or employees than those of people who are not government agents or employees?
5. Are you, a close relative, or a close friend are employed in academia?
6. Are you, a close relative, or a close friend are employed as a researcher?
7. Are you, a close relative, or a close friend an employee, alumnus or alumna of Georgia Tech?
8. Have you, a close relative, or a close friend ever worked for the Central Intelligence Agency, or any other domestic or foreign intelligence agency department, bureau or service?
9. Have you, a close relative, or a close friend ever had a security clearance from the United States government?

10. Have you, a close relative, or a close friend ever been given a credit or debit card by your employer?
11. Have you, a close relative, or a close friend ever done consulting work in addition to, and outside of, your primary employment?
12. Have you, a close relative, or a close friend ever been the victim of a crime?
13. Have you, a close relative, or a close friend ever accused of a crime?
14. Do any of you have a problem with the legal presumption that a person accused of a crime is presumed innocent unless proven guilty beyond a reasonable doubt?
15. The prosecution has to prove beyond a reasonable doubt that the Defendant is guilty on each of the legal elements of the offenses which the Defendant is charged with. Do any of you have a problem with the prosecution's burden of proving beyond a reasonable doubt that the Defendant is guilty on each of the legal elements of the offenses which the Defendant is charged with?
16. Do any of you have any problem with the legal rule that a Defendant is not required to put up any evidence in his or her defense, or to testify in his or her defense?
17. In the course of being asked these questions by the Court and the lawyers, have any of you formed an opinion about the case? If so, please state what the opinion is.

18. Is there anything else which has not been asked about which might prevent any of you from being fair and impartial jurors in this case?